

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

SALA PRIMARY LLC,
Plaintiff,

VS.

UNITED STATES LIABILITY
INSURANCE COMPANY AND
GLENN KNIES,
Defendants.

§
§
§
§
§
§
§
§

Civil Action No. 5:16-cv-00295

NOTICE OF DISMISSAL WITH PREJUDICE

Plaintiff Sala Primary LLC (“Plaintiff”) files this notice of dismissal pursuant to Federal Rule of Civil Procedure 41(a)(2).

1. Plaintiff filed this lawsuit against Defendants United States Liability Insurance Company (“USLIC”) and Glenn Knies (“Defendants”) on or about September 7, 2016. (Dkt. 1-2).
2. USLIC has answered. (Dkt. 2).
3. Mr. Knies filed a Rule 12(b) Motion to Dismiss for Insufficient Service of Process and Lack of Personal Jurisdiction. (Dkt. 3).
4. Plaintiff voluntarily dismissed his claims against Mr. Knies without prejudice. (Dkt. 5-7).
5. Plaintiff moves to dismiss this lawsuit and all claims against all Defendants with prejudice.
6. Defendants are unopposed to the dismissal.
7. This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.
8. A receiver has not been appointed in this case.

9. This case is not governed by any federal statute that requires a court order for dismissal of the case.
10. Plaintiff has not previously dismissed any federal or state court suit based on or including the same claims as those presented in this case.
11. This dismissal is with prejudice.

Respectfully submitted,

LAWRENCE LAW FIRM
3112 Windsor Rd., Suite A234
Austin, Texas 78703
(956) 994-0057
(800) 507-4152 FAX

BY: 
LARRY W. LAWRENCE, JR.

State Bar No. 00794145

Fed I.D. No.: 2182

MICHAEL LAWRENCE

State Bar No. 24055826

Federal ID No. 705429

Cartwright Law Firm, L.L.P.

1300 Post Oak Blvd. 760

Houston, Texas 77056

(713) 840-0950

(713) 840-0046 (fax)

Dan Cartwright

State Bar No. 03942500

Ms. Lory Sopchak

State Bar No. 24076706

ATTORNEYS FOR PLAINTIFF

SALA PRIMARY, LLC

CERTIFICATE OF CONFERENCE

I hereby certify that on January 24th, 2017, I conferred with Debra Bradberry, counsel for Defendants United States Liability Insurance Company and Glenn Knies, regarding the foregoing, and she indicated that Defendants are unopposed to the dismissal of this lawsuit with prejudice as set forth in the foregoing instrument.


Michael Lawrence

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on all counsel of record electronically via CM/ECF for the United States District Court for the Southern District of Texas in accordance with the Federal Rules of Civil Procedure and Local Rule LR5 on February 8, 2017, as follows:

Lisa Gaye Mann
Bradley Bingham
Debra Bradberry
BINGHAM, MANN & HOUSE
4500 Yoakum Blvd.
Houston, Texas 77006
lmann@bmh-law.com
bbingham@bmh-law.com
dbradberry@bmh-law.com

Attorneys for Defendants


Michael Lawrence